

EXHIBIT Q

DEFENDANTS' AFFIRMATIVE DESIGNATIONS FOR JOHN SAROS					
DEPO DATE	DESIGNATIONS				
	Designation Type	Begin Page at	Begin Line at	End Page at	End Line at
1/22/2019	All Def Affirm	4	12	4	24
1/22/2019	All Def Affirm	7	17	7	19
1/22/2019	All Def Affirm	9	17	9	25
1/22/2019	All Def Affirm	10	3	10	6
1/22/2019	All Def Affirm	10	15	10	19
1/22/2019	All Def Affirm	10	24	11	5
1/22/2019	All Def Affirm	11	9	11	11
1/22/2019	All Def Affirm	29	19	30	22
1/22/2019	All Def Affirm	30	25	32	6
1/22/2019	All Def Affirm	32	16	32	20
1/22/2019	All Def Affirm	33	14	33	20
1/22/2019	All Def Affirm	37	9	37	12
1/22/2019	All Def Affirm	37	14	38	10
1/22/2019	All Def Affirm	38	12	38	12
1/22/2019	All Def Affirm	43	15	43	20
1/22/2019	All Def Affirm	44	20	45	10
1/22/2019	All Def Affirm	45	17	45	20
1/22/2019	All Def Affirm	45	22	45	23
1/22/2019	All Def Affirm	47	16	47	21
1/22/2019	All Def Affirm	49	1	49	9
1/22/2019	All Def Affirm	49	11	49	15
1/22/2019	All Def Affirm	49	17	50	11
1/22/2019	All Def Affirm	50	14	50	14
1/22/2019	All Def Affirm	64	16	65	14
1/22/2019	All Def Affirm	67	12	67	17
1/22/2019	All Def Affirm	87	8	87	19
1/22/2019	All Def Affirm	87	21	87	22
1/22/2019	All Def Affirm	98	20	100	6
1/22/2019	All Def Affirm	100	22	101	2
1/22/2019	All Def Affirm	101	4	101	8
1/22/2019	All Def Affirm	101	10	101	13
1/22/2019	All Def Affirm	101	15	101	25
1/22/2019	All Def Affirm	102	3	102	8
1/22/2019	All Def Affirm	102	11	102	11
1/22/2019	All Def Affirm	104	9	104	12
1/22/2019	All Def Affirm	109	7	109	17
1/22/2019	All Def Affirm	109	19	110	18
1/22/2019	All Def Affirm	110	21	111	15
1/22/2019	All Def Affirm	121	2	121	8
1/22/2019	All Def Affirm	121	11	121	14
1/22/2019	All Def Affirm	125	6	125	14
1/22/2019	All Def Affirm	125	16	126	6
1/22/2019	All Def Affirm	126	9	126	14
1/22/2019	All Def Affirm	128	3	128	7
1/22/2019	All Def Affirm	128	9	128	18
1/22/2019	All Def Affirm	128	23	129	21
1/22/2019	All Def Affirm	131	6	131	24
1/22/2019	All Def Affirm	135	1	135	4
1/22/2019	All Def Affirm	135	23	136	1
1/22/2019	All Def Affirm	136	4	136	12
1/22/2019	All Def Affirm	136	14	136	14
1/22/2019	All Def Affirm	136	25	137	4
1/22/2019	All Def Affirm	137	6	137	6

DEFENDANTS' AFFIRMATIVE DESIGNATIONS FOR JOHN SAROS					
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1/22/2019	All Def Affirm	137	8	137	10
1/22/2019	All Def Affirm	138	1	138	19
1/22/2019	All Def Affirm	140	20	141	8
1/22/2019	All Def Affirm	141	10	141	25
1/22/2019	All Def Affirm	142	2	142	2
1/22/2019	All Def Affirm	143	10	144	6
1/22/2019	All Def Affirm	157	7	157	10
1/22/2019	All Def Affirm	158	8	158	12
1/22/2019	All Def Affirm	174	18	174	22
1/22/2019	All Def Affirm	174	24	175	12
1/22/2019	All Def Affirm	175	15	175	15

PLAINTIFFS' OBJECTIONS & DEFENDANTS' RESPONSES FOR JOHN SAROS									
DEPO DATE	PLAINTIFFS' OBJECTIONS				DEFENDANTS' RESPONSES				
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1/22/2019	4	12	4	24	Cover page, not a proper designation				Exhibits 1-4 were designated with corresponding testimony within the transcript as well
1/22/2019	9	17	9	25	Relevance				Withdraw designation
1/22/2019	10	3	10	6	Relevance				Withdraw designation
1/22/2019	10	15	10	17	Relevance				Relevant to witnesses' employment history with Summit County
1/22/2019	10	18	10	19	Relevance				Withdraw designation
1/22/2019	10	24	11	5	Relevance				Withdraw designation
1/22/2019	11	9	11	11	Relevance				Withdraw designation
1/22/2019	29	19	30	22	Foundation; misstates prior testimony; argumentative; completeness; witness' full answer omitted				Inclusion of 29:19 - 30:13 resolves foundation objection and unfounded objection regarding the characterization of the witness' answer; 29:19 - 30:13 not required for completeness of this question and answer; no argument; witness' full answer was included
1/22/2019	30	25	32	6	Completeness				See objection to counter designation (32:7-13). The portion of the answer omitted from this designation is not responsive to the question.
1/22/2019	32	16	32	20	Completeness				The only portion of the question that was not included in the designation was attorney colloquy; the question and answer are complete
1/22/2019	33	14	33	20	Foundation; misstates prior testimony; speculation; argumentative				Not speculation as witness was testifying based on his personal knowledge; not a misstatement of previous testimony; witness testified to role at SCCS so appropriate foundation; no argument included in designation
1/22/2019	37	14	38	10	Foundation; misstates testimony; argumentative; speculative				Not speculation as witness was testifying based on his personal knowledge; not a misstatement of previous testimony; witness testified to role at SCCS so appropriate foundation; no argument included in designation
1/22/2019	38	12	38	12	Foundation; argumentative				witness testified to role at SCCS so appropriate foundation; no argument included in designation
1/22/2019	43	15	43	20	Foundation; argumentative				witness testified to role at SCCS so appropriate foundation; no argument included in designation
1/22/2019	44	20	45	10	Foundation; argumentative; completeness				Witness testified to role at SCCS so appropriate foundation; no argument included in designation; see also testimony designated at 30:20 - 32:6, 33:14-20
1/22/2019	45	17	45	20	Foundation; argumentative				Witness testified to role at SCCS so appropriate foundation; no argument included in designation; see also testimony designated at 30:20 - 32:6, 33:14-20
1/22/2019	49	1	49	9	Speculation; foundation; hearsay				Witness testified to role at SCCS so appropriate foundation; question asking about witness' recollection, so no speculation; no statement being offered to prove the truth of the matter asserted, so no hearsay
1/22/2019	49	11	49	15	Foundation; hearsay; speculation				Witness testified to role at SCCS so appropriate foundation; question asking about witness' recollection, so no speculation; no statement being offered to prove the truth of the matter asserted, so no hearsay
1/22/2019	49	17	50	11	Foundation; speculation; hearsay				Witness testified to role at SCCS so appropriate foundation; question asking about witness' recollection, so no speculation; no statement being offered to prove the truth of the matter asserted, so no hearsay
1/22/2019	50	14	50	14	misstates testimony; argumentative; foundation				no testimony being characterized, so no misstatement; no argument included in designation; Witness testified to role at SCCS so appropriate foundation
1/22/2019	64	16	65	14	Relevance; foundation				Withdraw designation
1/22/2019	67	12	67	17	Relevance; foundation				Withdraw designation
1/22/2019	87	8	87	19	Speculation; foundation; argumentative; prejudicial				Witness testified to role at SCCS, and specifically to his knowledge regarding budgeting issues (98:20 - 99:4) so appropriate foundation; question asking about witness' recollection and knowledge pertaining to his direct involvement in issue discussed, so no speculation; no argument included in designation; probative value of evidence of negative public image (and related causes) of SCCS outweighs any prejudice
1/22/2019	87	21	87	22	Foundation; speculation				Witness testified to role at SCCS, and specifically to his knowledge regarding budgeting issues (98:20 - 99:4) so appropriate foundation; question asking about witness' recollection and knowledge pertaining to his direct involvement in issue discussed, so no speculation
1/22/2019	98	20	100	6	Calls for expert opinion				Testimony goes to facts of which witness established he had personal knowledge, not lay or expert opinions
1/22/2019	100	22	101	2	Argumentative; calls for expert opinion				Testimony goes to facts of which witness established he had personal knowledge, not lay or expert opinions; testimony regarding State funding is factual in nature, witness is offering no opinion; no argument included in designation
1/22/2019	101	4	101	8	Foundation; calls for expert opinion				Testimony goes to facts of which witness established he had personal knowledge, not lay or expert opinions; testimony regarding State funding is factual in nature, witness is offering no opinion

PLAINTIFFS' OBJECTIONS & DEFENDANTS' RESPONSES FOR JOHN SAROS						
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1/22/2019	101	10	101	13	Foundation; argumentative; calls for expert opinion	Testimony goes to facts of which witness established he had personal knowledge, not lay or expert opinions; testimony regarding State funding is factual in nature, witness is offering no opinion; no argument included in designation
1/22/2019	101	15	101	25	Relevance; calls for expert opinion on State funding of SCCS	Testimony goes to facts of which witness established he had personal knowledge, not lay or expert opinions; testimony regarding State funding is factual in nature, witness is offering no opinion; testimony is relevant as it goes to the issue of the SCCS budget and from which sources SCCS received funding
1/22/2019	102	3	102	8	Relevance; foundation; calls for expert opinion	Testimony goes to facts of which witness established he had personal knowledge, not lay or expert opinions; testimony regarding State funding is factual in nature, witness is offering no opinion; testimony is relevant as it goes to the issue of the SCCS budget and from which sources SCCS received funding
1/22/2019	102	11	102	11	Foundation; relevance; speculative	Testimony goes to facts of which witness established he had personal knowledge, not lay or expert opinions; testimony regarding State funding is factual in nature, witness is offering no opinion; testimony is relevant as it goes to the issue of the SCCS budget and from which sources SCCS received funding; witness testifying to his knowledge, so no speculation
1/22/2019	104	9	104	12	Relevance; completeness; 403	Testimony is relevant as it goes to the issue of the SCCS budget and sources of funding for SCCS; probative value of testimony outweighs any prejudice
1/22/2019	109	7	109	17	Speculation; foundation; calls for expert testimony	Testimony goes to facts of which witness established he had personal knowledge, not lay or expert opinions; witness testified to role at SCCS so appropriate foundation; question asks about witness' personal knowledge so no speculation
1/22/2019	109	19	110	18	Foundation; argumentative; misstates testimony	Witness testified to role at SCCS so appropriate foundation; no argument included in designation; no characterization of testimony so does not misstate testimony
1/22/2019	110	21	111	15	Relevance; argumentative; foundation	Witness testified to role at SCCS, and specifically to his knowledge regarding budgeting issues (98:20 - 99:4) so appropriate foundation; no characterization of testimony, so does not misstate testimony; testimony is relevant as it goes to the issue of the SCCS budget and from which sources SCCS received funding and purposes of such funding; no argument included in designation
1/22/2019	125	6	125	14	Relevance; foundation; argumentative	Witness testified to role at SCCS, and specifically to his knowledge regarding budgeting issues (98:20 - 99:4) so appropriate foundation; testimony is relevant as it goes to the issue of the SCCS budget and from which sources SCCS received funding and purposes of such funding; no argument included in designation
1/22/2019	125	16	126	6	Foundation; relevance; argumentative	Witness testified to role at SCCS, and specifically to his knowledge regarding budgeting issues (98:20 - 99:4) so appropriate foundation; testimony is relevant as it goes to the issue of the SCCS budget and from which sources SCCS received funding and purposes of such funding; no argument included in designation
1/22/2019	128	3	128	7	Foundation; compound; argumentative	Witness testified to role at SCCS and knowledge regarding impact of drugs on SCCS, so appropriate foundation; no compound; no argument included in designation
1/22/2019	128	9	128	18	Relevance	Testimony and accompanying exhibit No. 3 is relevant as it goes to the issue of the impact of the recession on SCCS and staffing cuts made in 2008/2009 as a result of the recession
1/22/2019	128	23	129	21	Relevance	Testimony and accompanying exhibit No. 3 is relevant as it goes to the issue of the impact of the recession on SCCS and staffing cuts made in 2008/2009 as a result of the recession
1/22/2019	131	6	131	24	Relevance; completeness; argumentative	Testimony and accompanying exhibit No. 3 is relevant as it goes to the issue of the impact of the recession on SCCS and budgetary cuts made in 2008/2009 as a result of the recession; no argument included in designation
1/22/2019	135	1	135	4	Foundation; completeness	Witness testified to role at SCCS, and specifically to his knowledge regarding budgeting issues (98:20 - 99:4) so appropriate foundation
1/22/2019	135	23	136	1	Foundation; argumentative	Witness testified to role at SCCS, and specifically to his knowledge regarding budgeting and staffing issues so appropriate foundation; no argument included in designation
1/22/2019	136	4	136	12	Argumentative	no argument included in designation
1/22/2019	136	25	137	4	Foundation; argumentative; calls for expert testimony	Witness testified to role at SCCS and issues impacting the number of children in custody so appropriate foundation; no argument included in designation; testimony goes to facts of which witness established he had personal knowledge, not lay or expert opinions
1/22/2019	137	8	137	10	Calls for expert opinion	testimony goes to facts of which witness established he had personal knowledge, not lay or expert opinions
1/22/2019	138	1	138	19	Calls for expert testimony	Testimony authenticates and identifies Exhibit No. 4, no expert or lay opinions included

PLAINTIFFS' OBJECTIONS & DEFENDANTS' RESPONSES FOR JOHN SAROS						
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1/22/2019	140	20	141	8	Compound; argumentative; calls for expert testimony	No compound; no argument included in designation; testimony regarding facts of which witness established he had personal knowledge, not lay or expert opinions
1/22/2019	141	10	141	25	Compound; argumentative; relevance	No compound; no argument included in designation; testimony and accompanying exhibit No. 4 is relevant as it goes to the issue of staffing and budgetary cuts made by SCCS that were unrelated to opioids and left a deficit in resources for the agency
1/22/2019	143	10	144	6	Calls for expert testimony; relevance	Testimony regarding facts of which witness established he had personal knowledge, not lay or expert opinions; testimony is relevant as it goes to the issue of staffing and budgetary cuts made by SCCS that were unrelated to opioids and left a deficit in resources for the agency and other causes of increased workload
1/22/2019	157	7	157	10	Incomplete answer designated; completeness; fact could be stipulated	Improper objection (fact could be stipulated); remaining portion of answer (157:11 - 158:7) is nonresponsive
1/22/2019	158	8	158	12	Argumentative; foundation; misstates testimony	Foundation established 157:7-10; no argument included in designation; no prior testimony characterized
1/22/2019	174	18	174	22	Relevance; argumentative; calls for expert testimony	Testimony regarding facts of which witness established he had personal knowledge, not lay or expert opinions; testimony is relevant as it goes to the issue of impact of substance abuse on SCCS budget; no argument included in designation
1/22/2019	174	24	175	12	Relevance; argumentative; speculation	testimony is relevant as it goes to the issue of impact of substance abuse on SCCS budget; testimony regarding witness' personal knowledge, so not speculative; no argument included in designation
1/22/2019	175	15	175	15	Relevance; argumentative; speculation	testimony is relevant as it goes to the issue of impact of substance abuse on SCCS budget; testimony regarding witness' personal knowledge, so not speculative; no argument included in designation

PLAINTIFFS' COUNTER DESIGNATIONS FOR JOHN SAROS					
DEPO DATE	PLAINTIFFS' COUNTER DESIGNATIONS				
	Designation Type	Begin Page at	Begin Line at	End Page at	End Line at
1/22/2019	Plaintiff Counter	23	6	29	4
1/22/2019	Plaintiff Counter	29	9	29	18
1/22/2019	Plaintiff Counter	30	23	32	15
1/22/2019	Plaintiff Counter	32	7	32	15
1/22/2019	Plaintiff Counter	33	21	35	15
1/22/2019	Plaintiff Counter	33	21	36	3
1/22/2019	Plaintiff Counter	39	2	42	7
1/22/2019	Plaintiff Counter	42	12	43	10
1/22/2019	Plaintiff Counter	45	11	45	16
1/22/2019	Plaintiff Counter	45	25	47	25
1/22/2019	Plaintiff Counter	47	22	48	7
1/22/2019	Plaintiff Counter	86	1	86	5
1/22/2019	Plaintiff Counter	100	7	100	21
1/22/2019	Plaintiff Counter	104	13	104	25
1/22/2019	Plaintiff Counter	104	13	104	24
1/22/2019	Plaintiff Counter	121	2	121	15
1/22/2019	Plaintiff Counter	121	2	121	14
1/22/2019	Plaintiff Counter	131	25	132	17
1/22/2019	Plaintiff Counter	135	5	135	12
1/22/2019	Plaintiff Counter	135	23	136	14
1/22/2019	Plaintiff Counter	145	11	145	14
1/22/2019	Plaintiff Counter	157	11	158	7
1/22/2019	Plaintiff Counter	173	12	173	18

**DEFENDANTS' OBJECTIONS TO PLAINTIFFS' COUNTER DESIGNATIONS FOR
JOHN SAROS**

DEPO DATE	DEFENDANTS' OBJECTIONS				DEFENDANTS' OBJECTIONS
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1/22/2019	23	6	24	8	NR; 402; 403
1/22/2019	24	10	29	4	NR; 402; 403; INC
1/22/2019	29	9	29	18	402
1/22/2019	32	7	32	13	NR
1/22/2019	32	15	32	15	COL
1/22/2019	33	21	35	15	NR; 402; 602
1/22/2019	35	16	36	3	402
1/22/2019	39	2	41	23	602; NR; 40:19 - 41:23 subject of pending motion in limine
1/22/2019	42	12	43	10	602; NR
1/22/2019	45	11	45	16	NR: CML
1/22/2019	46	21	47	14	NR
1/22/2019	104	13	104	24	NR
1/22/2019	131	25	132	17	NR
1/22/2019	135	5	135	12	INC
1/22/2019	157	11	158	7	NR
1/22/2019	173	12	173	18	NR; 402; 403